



October 31, 2017

Federal Communications Commission
950 Junction Drive
Annapolis Junction, MD 20701

RE: Comment Letter regarding CUNA's TCPA Petition for Declaratory Ruling
CG Docket No. 02-278

To Whom It May Concern:

On behalf of the more than 300,000 members of Wright-Patt Credit Union, Inc. ("WPCU"), we would like to thank you for the opportunity to express our thoughts regarding the Credit Union National Association's ("CUNA") Petition for Declaratory Ruling under the Telephone Consumer Protection Act of 1991 ("TCPA").

As a member-owned financial cooperative, WPCU strives to protect our members' privacy and promote their financial well-being. As such we support the well-intended spirit of the TCPA and its positive impact on protecting consumers. However, WPCU agrees with CUNA's assessment that the TCPA's prior-express-consent requirement is financially and laboriously burdensome, definitively unclear, and disruptive to member service. Simply, the current construct of the TCPA creates a significant barrier to credit unions' ability to communicate and proactively advise our members so that they are able to make fully informed financial decisions. We wholeheartedly support CUNA's request that the FCC adopt a business relationship exemption from this requirement for credit unions.

The TCPA's prior-express-consent requirement has posed many troublesome issues for WPCU:

- As with most credit unions, our core banking system provides no means to track and identify whether a phone number is a mobile number;
- It is cost prohibitive for WPCU to obtain consent from our 300,000+ existing members across the various service channels we use to communicate;
- The current definitional framework of the TCPA inhibits WPCU's ability to provide the most efficient notifications available to members for issues such as fraud alerts, suspected data breach and identify theft;
- WPCU attracts members both directly and indirectly, meaning automating the consent process is costly and time consuming;
- TCPA ignores the fact that an increasing majority of consumers utilize mobile phones which are frequently their primary, if not sole, means of communication and conducting financial transactions;
- The definition of "auto dialer" is unclear and has caused over-cautiousness for both our automated fraud alerts to members and automated calls reminding members to make their loan payments prior to receiving fees and/or penalties.



As member-owned financial cooperatives, credit unions were created and remain as the primary consumer protection entities in the financial sector. WPCU's primary objective is to empower our members with material, real-time information that empowers them to make the best financial decisions. The current TCPA framework has undermined this objective by creating a litigation incentive to pursue well-meaning financial institutions that simply do not have the infrastructure in place to track the myriad of consumer touchpoints which now require definitive consent to share information. Credit unions need a common sense revision to the rule that recognizes the fundamental relationship of trust we have with our members.

Respectfully,



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